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June 27, 2025

BY ECF AND EMAIL

The Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, New York 10007
EngelmayerNYSDChambers@nysd.uscourts.gov

Re: *United States v. Do Hyeong Kwon*, 23-cr-151

Dear Judge Engelmayer:

We represent Do Kwon in the above-captioned case. First, the parties respectfully request a two-week extension of the deadline to file pretrial motions (and the deadlines for responses and replies), which are currently due July 1, 2025. (The government joins in this request.) Though Mr. Kwon is prepared to file motions by July 1, the parties continue to engage in productive discussions around pretrial motions and related issues. An extension of the deadline would allow the parties to continue those discussions and potentially avoid unnecessary motion practice. The parties believe that no other deadlines would be affected by such an extension.

Second, the parties have met and conferred about the deadline for Mr. Kwon's expert disclosures. The parties propose that Mr. Kwon provide expert disclosures by December 1, 2025, which would be one month after the government's disclosures on October 31, 2025, and at least two months before the scheduled trial date.

Respectfully submitted,



David Patton